

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

INDICTMENT

MATTEO ADAN MARROQUIN,
LACY LYNN ZIMMERMAN
a.k.a. LACY LYNN HAMM, and
ANDREW TYLER LEENHEER,

Defendants.

The Grand Jury charges:

COUNT 1

(Theft of Firearms from Federal Firearms Licensee)

On or about December 7 or 8, 2018, in Allegan County, in the Southern Division of the
Western District of Michigan,

MATTEO ADAN MARROQUIN and
LACY LYNN ZIMMERMAN,
a.k.a. LACY LYNN HAMM,

knowingly stole, and aided and abetted the theft, from the inventory of Graafschap Hardware, in
Holland, Michigan, a licensed federal firearms dealer, the following firearms that had been
transported and shipped in interstate or foreign commerce:

1. Mossberg 12-gauge over-under shotgun;
2. Beretta, Model 626, side-by-side double barrel shotgun;
3. Lefever, Nitro Special, side-by-side double barrel shotgun;
4. J.C. Higgins, Model 311A, side-by-side double barrel shotgun;
5. Winchester 24, side-by-side double barrel shotgun, serial no. 95524;
6. Winchester 24, side-by-side double barrel shotgun, serial no. 68632;
7. Ranger side-by-side double barrel shotgun;
8. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A39389;
9. Century Arms, Model RAS47, 7.62 x 39 semiautomatic rifle;
10. Vyatskie Polyany, Model VEPR12, 12-gauge semi-automatic shotgun;

11. Remington Arms, Model 870, .410 pump action shotgun;
12. Ranger 120, pump action 12-gauge shotgun;
13. Mossberg 835, 12-gauge pump action shotgun;
14. Winchester, Model 12, 12-gauge pump action shotgun;
15. New England Firearms, Pardner Pump, 12-gauge, pump action shotgun;
16. Mossberg 500A, 12-gauge pump action shotgun;
17. Stoeger Arms P350, 12-gauge pump action shotgun;
18. Winchester, Super X Pump, 12-gauge, pump action shotgun;
19. Winchester, Model 12, 12-gauge, pump action shotgun;
20. Remington, 879 Express Magnum, 12-gauge, pump action shotgun;
21. Palmetto Armory, Model PSAK47, 7.62 x 39 semiautomatic rifle with a 30-round magazine; and
22. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A34166.

18 U.S.C. § 924(m)

18 U.S.C. § 2

COUNT 2
(Possession of Stolen Firearms)

From on or about December 7 or 8, 2018, through on or about December 9 or 10, 2018, in Allegan, Ottawa, and Wexford Counties, and elsewhere, in the Southern Division of the Western District of Michigan,

MATTEO ADAN MARROQUIN and
LACY LYNN ZIMMERMAN,
a.k.a. LACY LYNN HAMM,

knowingly possessed stolen firearms, which had been shipped and transported in interstate or foreign commerce, knowing and having reasonable cause to believe that the firearms were stolen, namely:

1. Mossberg 12-gauge over-under shotgun;
2. Beretta, Model 626, side-by-side double barrel shotgun;
3. Lefever, Nitro Special, side-by-side double barrel shotgun;
4. J.C. Higgins, Model 311A, side-by-side double barrel shotgun;
5. Winchester 24, side-by-side double barrel shotgun, serial no. 95524;
6. Winchester 24, side-by-side double barrel shotgun, serial no. 68632;
7. Ranger side-by-side double barrel shotgun;
8. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A39389;
9. Century Arms, Model RAS47, 7.62 x 39 semiautomatic rifle;
10. Vyatskie Polyany, Model VEPR12, 12-gauge semi-automatic shotgun;
11. Remington Arms, Model 870, .410 pump action shotgun;
12. Ranger 120, pump action 12-gauge shotgun;
13. Mossberg 835, 12-gauge pump action shotgun;
14. Winchester, Model 12, 12-gauge pump action shotgun;
15. New England Firearms, Pardner Pump, 12-gauge, pump action shotgun;
16. Mossberg 500A, 12-gauge pump action shotgun;
17. Stoeger Arms P350, 12-gauge pump action shotgun;
18. Winchester, Super X Pump, 12-gauge, pump action shotgun;
19. Winchester, Model 12, 12-gauge, pump action shotgun;
20. Remington, 879 Express Magnum, 12-gauge, pump action shotgun;
21. Palmetto Armory, Model PSAK47, 7.62 x 39 semiautomatic rifle with a 30-round magazine; and
22. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A34166.

18 U.S.C. § 922(j)

18 U.S.C. § 924(a)(2)

COUNT 3

(Possession of Stolen Firearm)

From on or about December 8, 2018, through on or about December 9, 2018, in Allegan and Ottawa Counties, in the Southern Division of the Western District of Michigan,

ANDREW TYLER LEENHEER

knowingly possessed a stolen firearm, a Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe that the firearm was stolen.

18 U.S.C. § 922(j)

18 U.S.C. § 924(a)(2)

COUNT 4
(Felon in Possession of Firearms)

From on or about December 7 or 8, 2018, through on or about December 9 or 10, 2018,
in Allegan, Ottawa, and Wexford Counties, and elsewhere, in the Southern Division of the
Western District of Michigan,

MATTEO ADAN MARROQUIN and
LACY ZIMMERMAN,
a.k.a. LACY LYNN HAMM,

being persons who had been convicted of one or more offenses punishable by imprisonment for a
term exceeding one year under the laws of the state of Michigan, knowingly possessed firearms
in and affecting commerce, namely:

1. Mossberg 12-gauge over-under shotgun;
2. Beretta, Model 626, side-by-side double barrel shotgun;
3. Lefever, Nitro Special, side-by-side double barrel shotgun;
4. J.C. Higgins, Model 311A, side-by-side double barrel shotgun;
5. Winchester 24, side-by-side double barrel shotgun, serial no. 95524;
6. Winchester 24, side-by-side double barrel shotgun, serial no. 68632;
7. Ranger side-by-side double barrel shotgun;
8. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A39389;
9. Century Arms, Model RAS47, 7.62 x 39 semiautomatic rifle;
10. Vyatskie Polyany, Model VEPR12, 12-gauge semi-automatic shotgun;
11. Remington Arms, Model 870, .410 pump action shotgun;
12. Ranger 120, pump action 12-gauge shotgun;
13. Mossberg 835, 12-gauge pump action shotgun;
14. Winchester, Model 12, 12-gauge pump action shotgun;
15. New England Firearms, Pardner Pump, 12-gauge, pump action shotgun;
16. Mossberg 500A, 12-gauge pump action shotgun;
17. Stoeger Arms P350, 12-gauge pump action shotgun;
18. Winchester, Super X Pump, 12-gauge, pump action shotgun;
19. Winchester, Model 12, 12-gauge, pump action shotgun;
20. Remington, 879 Express Magnum, 12-gauge, pump action shotgun;
21. Palmetto Armory, Model PSAK47, 7.62 x 39 semiautomatic rifle with a 30-round magazine; and
22. Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, serial no. C39V2A34166.

18 U.S.C. § 922(g)(1)
18 U.S.C. § 921(a)
18 U.S.C. § 924(a)(2)

COUNT 5

(Felon in Possession of a Firearm)

From on or about December 8, 2018, through on or about December 9, 2018, in Allegan and Ottawa Counties, in the Southern Division of the Western District of Michigan,

ANDREW TYLER LEENHEER,

being a person who had been convicted of an offense punishable by imprisonment for a term exceeding one year under the laws of the state of Michigan, knowingly possessed a Century Arms, Model C39V2, 7.62 x 39 semiautomatic rifle, in and affecting commerce.

18 U.S.C. § 922(g)(1)

18 U.S.C. § 921(a)

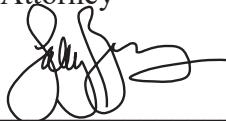
18 U.S.C. § 924(a)(2)

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
United States Attorney



SALLY J. BERENS
Assistant United States Attorney